

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT APPLICATION SUMMARY FORM

Completed by: Mark Labhart

GENERAL INFORMATION:

Name:	3M Cynthiana
Address:	1308 New Lair Road, Cynthiana, KY 41031
Date application received:	December 12, 1999
SIC/Source description:	2672, Coated and Laminated Paper
Source ID #:	21-097-00021
Source A.I. #:	1752
Activity #:	APE20040001
Permit number:	V-06-015

APPLICATION TYPE/PERMIT ACTIVITY:

<input checked="" type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input type="checkbox"/> Permit modification	<input type="checkbox"/> Conditional major
__Administrative	<input checked="" type="checkbox"/> Title V
__Minor	<input checked="" type="checkbox"/> Synthetic minor
__Significant	<input checked="" type="checkbox"/> Operating
<input type="checkbox"/> Permit renewal	<input checked="" type="checkbox"/> Construction/operating

COMPLIANCE SUMMARY:

<input type="checkbox"/> Source is out of compliance	<input type="checkbox"/> Compliance schedule included
<input checked="" type="checkbox"/> Compliance certification signed	

APPLICABLE REQUIREMENTS LIST:

<input type="checkbox"/> NSR	<input checked="" type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP
<input checked="" type="checkbox"/> PSD	<input checked="" type="checkbox"/> NESHAPS	<input type="checkbox"/> Other
<input type="checkbox"/> Netted out of PSD/NSR	<input type="checkbox"/> Not major modification per 401 KAR 51:001, 1(116)(b)	

MISCELLANEOUS:

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☒ Source applied for federally enforceable emissions cap
- ☒ Source provided terms for alternative operating scenarios
- ☒ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☒ Certified by responsible official
- ☒ Diagrams or drawings included
- ☒ Confidential business information (CBI) submitted in application
- ☐ Pollution Prevention Measures
- ☐ Area is non-attainment (list pollutants):

EMISSIONS SUMMARY:

Pollutant	Actual (tpy) (2005 Emissions Survey)	Potential (tpy)
PM/PM ₁₀	2.0	42.1
SO ₂	0.1	0.4
NO _x	26.3	71.3
CO	7.4	53.9
Lead	0	negligible
VOC		
1R and 2R		668 ⁽¹⁾
1R, 2R additions		51.6 ^(1, 2)
3R		51.5 ^(1, 2)
4R		329 ⁽¹⁾
5R		200 ⁽¹⁾
Misc.		11.5
Existing Totals	71.9	1311.6
New Cobra Line	35.7	35.7
VOC Total	107.6	1347.3
Single HAPs > 10 tpy		
MIBK, 108-10-1	0	10.3
Toluene, 108-88-3	0.12	27.7
Xylene, 1330-20-7	0.18	35
Source wide HAPs		79.8

(1) Title V / PSD potential from BACT analysis

(2) Synthetic Minor Limit

SOURCE DESCRIPTION:

3M makes note pads and pressure sensitive tape by coating paper and film. This is the initial issuance of a source wide Title V permit.

The main source of emissions are the 5 web-coating lines and associated supporting equipment. All the web-coating lines and various individual applicators associated with these lines are subject to 401 KAR 51:017, Prevention of Significant Deterioration of air quality (PSD), and all have undergone BACT analysis. The web coating lines are regulated too under NSPS, 40 CFR 60 Subpart RR; MACT Regulation 40 CFR 63 Subpart JJJJ, and State Regulations 401 KAR 59:210, 401 KAR 59:212, and 401 KAR 63:020. There are also Synthetic Minor limitations that have been subsumed into this permit.

With this permit action the source is proposing to add a sixth coating line. This new coating line will use only water-based coatings and will operate uncontrolled. The new line is smaller scale than any of the previous coating lines. Potential emissions of VOC are 35.7 tpy. BACT analysis was not required.

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

The source has various equipment subject to either BACT or Synthetic Minor limitations as well as other applicable State and Federal regulations. Emission limitations range from daily average limits on VOC emissions from the applicable State applicable regulations (RACT), to 12-month rolling total emissions limitations taken as a Synthetic Minor limitation or as a condition of BACT.

OPERATIONAL FLEXIBILITY:

3M makes many different products that require different configuration of the webcoating lines. Not every applicator associated with a given webcoating line is in operation for each product made. Further, some of the applicators can be operated with or without an associated emission control device. For each applicator or coating line that has an associated emission control device, the source has provided BACT analysis for both the controlled and uncontrolled operating modes. Operational flexibility is also built into the applicable NESHAP which allows sources the choice of using all compliant coatings or control of emissions in order to achieve compliance.